

**REMARKS**

Applicants have carefully reviewed this application in light of the Office Action mailed July 12, 2007. Applicants have amended Claims 2-6, 35-36, and 38-40, canceled Claim 41, and added new Claim 42. Claims 2-7, 9-14, 33-40, and 42 are pending in the Application. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

***Claim Rejections -- 35 U.S.C. § 103***

The Examiner rejected Claims 2-7, 9-14, 38-39, and 41 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,141,597 issued to Botzko et al. ("*Botzko*") in view of U.S. Patent No. 5,793,415 issued to Gregory, III et al. ("*Gregory*").

**Independent Claim 38 and Dependent Claims 2-7 and 42**

Independent Claim 38, as amended, recites:

An apparatus for using a plurality of processors to support a media conference, comprising:

a system resource management (SRM) module coupled to one or more mixing processors and a plurality of media transformation processors, the SRM module operable to receive a request to support a media conference and, in response, to allocate the media conference to at least a first mixing processor and a first media transformation processor, the SRM module further operable to communicate to the mixing processor control information identifying the first media transformation processor;

wherein the first a mixing processor is operable to mix input media information associated with two or more first participants to generate output media information for communication to a second participant, wherein the first mixing processor communicates the output media information to the first media transformation processor identified by the control information received from the SRM module;

wherein the first media transformation processor is coupled to the mixing processor--and operable to receive the output media information from the mixing processor, to encode the output media information to generate an output data stream, and to communicate the output data stream to the second participant's end-user device;

wherein the mixing processor and the first media transformation processor are separate hardware components.

The Examiner's proposed combination of *Botzko* and *Gregory* does not disclose, teach, or suggest the apparatus of Claim 38. Neither *Botzko* nor *Gregory* disclose, teach, or suggest "a system resource management (SRM) module coupled to one or more mixing processors and a plurality of media transformation processors, the SRM module operable to receive a request to support a media conference and, in response, to allocate the media conference to at least a first mixing processor and a first media transformation processor, the SRM module further operable to communicate to the mixing processor control information identifying the first media transformation processor," as cited in Claim 38. Both *Botzko* and *Gregory* depict a single mixer and a single encoder. Figure 3 of *Botzko* includes mixer 28 and encoder 29, and Figure 2 of *Gregory* includes mixer 64 and codec 54. Thus, both teach away from a SRM module that (1) is coupled to one or more mixing processors and a plurality of media transformation processors; (2) receives a request to support a media conference and, in response, allocates the media conference to at least a first mixing processor and a first media transformation processor; and (3) communicates to the mixing processor control information identifying the first media transformation processor.

Moreover, as the Examiner acknowledged in the latest Office Action, *Botzko* does not disclose, teach, or suggest a "mixing processor" and a "first media transformation processor" that "are separate hardware components," as recited in Claim 38. (Office Action mailed 07/12/2007, at p. 3.) *Botzko* describes an audio processor 14'c which includes a mixer 28 to produce an uncompressed composite audio signal and a time compression encoder 29 to produce a corresponding compressed composite audio signal. Col. 6, l. 46 - col. 7, l. 11. *Botzko* does not state that mixer 28 and encoder 29 are separate hardware components. Rather, *Botzko* describes them as blocks within a single audio processor 14'c. Moreover, audio processor 14'c is a part of bridge 12, which *Botzko* states "operates primarily in software." Col. 4, ll. 14-15. Thus, the block diagrams of Figures 2 and 3 illustrate functional blocks implemented in software—not separate hardware components. For these reasons, *Botzko* further teaches away from the claimed invention.

For at least these reasons, the Examiner's proposed combination of *Botzko* and *Gregory* does not disclose, teach, or suggest the apparatus of Claim 38. Accordingly,

Applicants respectfully request reconsideration and allowance of independent Claims 38, as well as Claims 2-7 and 42 which depend from Claim 38.

Independent Claim 39 and Dependent Claims 9-14

Independent Claim 39 recites:

A method for using a plurality of processors to support a media conference, comprising:

receiving a request to support a media conference;

assigning a mixing processor a task of mixing input media information associated with two or more first participant to generate output media information;

assigning a first media transformation processor a task of encoding the output media information to generate an output data stream for communication to a participant in the media conference;

communicating to the mixing processor control information identifying the first media transformation processor;

mixing the input media information associated with the first participants to generate the output media information for communication to a the second participant using a the mixing processor;

communicating the output media information from the mixing processor to a the first media transformation processor, wherein the mixing processor and the first media transformation processor are separate hardware components;

encoding the output media information to generate an the output data stream using the first media transformation processor; and

communicating the output data stream from the first media transformation processor to the second participant's end-user device.

The Examiner's proposed combination of *Botzko* and *Gregory* does not disclose, teach, or suggest the method of Claim 39. Neither *Botzko* nor *Gregory* disclose, teach, or suggest "receiving a request to support a media conference," "assigning a mixing processor a task of mixing input media information associated with two or more first participant to generate output media information," "assigning a first media transformation processor a task of encoding the output media information to generate an output data stream for

communication to a participant in the media conference,” and “communicating to the mixing processor control information identifying the first media transformation processor.” Both *Botzko* and *Gregory* depict a single mixer and a single encoder. Figure 3 of *Botzko* includes mixer 28 and encoder 29, and Figure 2 of *Gregory* includes mixer 64 and codec 54. Thus, both teach away from “receiving a request to support a media conference,” “assigning a mixing processor a task of mixing input media information associated with two or more first participant to generate output media information,” “assigning a first media transformation processor a task of encoding the output media information to generate an output data stream for communication to a participant in the media conference,” and “communicating to the mixing processor control information identifying the first media transformation processor.”

Moreover, as the Examiner acknowledged in the latest Office Action, *Botzko* does not disclose, teach, or suggest the use of a “mixing processor” and a “first media transformation processor” that are “separate hardware components,” as recited in Claim 39. (Office Action mailed 01/29/2007, at p. 3.) *Botzko* describes an audio processor 14’c which includes a mixer 28 to produce an uncompressed composite audio signal and a time compression encoder 29 to produce a corresponding compressed composite audio signal. Col. 6, l. 46 - col. 7, l. 11. *Botzko* does not state that mixer 28 and encoder 29 are separate hardware components. Rather, *Botzko* describes them as blocks within a single audio processor 14’c. Moreover, audio processor 14’c is a part of bridge 12, which *Botzko* states “operates primarily in software.” Col. 4, ll. 14-15. Thus, the block diagrams of Figures 2 and 3 illustrate functional blocks implemented in software—not separate hardware components. For these reasons, *Botzko* further teaches away from the claimed invention.

For at least these reasons, the Examiner’s proposed combination of *Botzko* and *Gregory* does not disclose, teach, or suggest the method of Claim 39. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 39, as well as Claims 9-14 which depend from Claim 39.

### ***Claim Rejections -- 35 U.S.C. § 103***

#### **Independent Claims 40 and Dependent Claims 33-37**

The Examiner rejected Claims 33, 35-37, and 40 under 35 U.S.C. § 103 as being unpatentable over *Botzko* in view of U.S. Patent No. 5,020,098 issued to Celli (“*Celli*”), and further in view of *Gregory*.

Independent Claim 40, as amended, recites:

A system for using a plurality of processors to support a media conference, comprising:

a plurality of end-user devices coupled to a data network and operable to generate input media information, to encode the input media information to generate input data streams, and to communicate the input data streams using the data network; and

a conferencing device coupled to the data network, the conferencing device comprising:

a system resource management (SRM) module coupled to one or more mixing processors and a plurality of media transformation processors, the SRM module operable to receive a request to support a media conference and, in response, to allocate the media conference to at least a first mixing processor and a first media transformation processor, the SRM module further operable to communicate to the mixing processor control information identifying the first media transformation processor;

wherein the first mixing processor is operable to mix input media information associated with two or more first participants to generate output media information for communication to a second participant; wherein the first mixing processor communicates the output media information to the first media transformation processor identified by the control information received from the SRM module;

wherein the first media transformation processor coupled to the mixing processor and operable to receive the output media information from the mixing processor, to encode the output media information to generate an output data stream, and to communicate the output data stream to the second participant's end-user device.

wherein the mixing processor and the first media transformation processor are separate hardware components.

The Examiner's proposed combination of *Botzko*, *Gregory*, and *Celli* does not disclose, teach, or suggest disclose, teach, or suggest "a system resource management (SRM) module coupled to one or more mixing processors and a plurality of media transformation processors, the SRM module operable to receive a request to support a media conference and,

in response, to allocate the media conference to at least a first mixing processor and a first media transformation processor, the SRM module further operable to communicate to the mixing processor control information identifying the first media transformation processor,” as cited in Claim 40. Both *Botzko* and *Gregory* depict a single mixer and a single encoder. Figure 3 of *Botzko* includes mixer 28 and encoder 29, and Figure 2 of *Gregory* includes mixer 64 and codec 54. Thus, both teach away from a SRM module that (1) is coupled to one or more mixing processors and a plurality of media transformation processors; (2) receives a request to support a media conference and, in response, allocates the media conference to at least a first mixing processor and a first media transformation processor; and (3) communicates to the mixing processor control information identifying the first media transformation processor.

Moreover, as the Examiner acknowledged in the latest Office Action, *Botzko* does not disclose, teach, or suggest a “mixing processor” and a “first media transformation processor” that “are separate hardware components,” as recited in Claim 38. (Office Action mailed 07/12/2007, at p. 3.) *Botzko* describes an audio processor 14’c which includes a mixer 28 to produce an uncompressed composite audio signal and a time compression encoder 29 to produce a corresponding compressed composite audio signal. Col. 6, l. 46 - col. 7, l. 11. *Botzko* does not state that mixer 28 and encoder 29 are separate hardware components. Rather, *Botzko* describes them as blocks within a single audio processor 14’c. Moreover, audio processor 14’c is a part of bridge 12, which *Botzko* states “operates primarily in software.” Col. 4, ll. 14-15. Thus, the block diagrams of Figures 2 and 3 illustrate functional blocks implemented in software—not separate hardware components. For these reasons, *Botzko* further teaches away from the claimed invention.

For at least these reasons, the Examiner’s proposed combination of *Botzko*, *Gregory*, and *Celli* does not disclose, teach, or suggest the system of Claim 40. Accordingly, Applicants respectfully request reconsideration and allowance of independent Claims 40, as well as Claims 33-37 which depend from Claim 40.

#### Dependent Claims 34

The Examiner also rejected Claims 34 under 35 U.S.C. § 103 as being unpatentable over *Botzko* in view of *Celli* and *Gregory*, and in further view of *Leondires*. As discussed above, *Botzko*, *Gregory*, and *Celli* fail to disclose “a system resource management (SRM)

module coupled to one or more mixing processors and one or more media transformation processors, the SRM module operable to receive a request to support a media conference and, in response, to allocate the media conference to at least a first mixing processor and a first media transformation processor, the SRM module further operable to communicate to the mixing processor control information identifying the first media transformation processor,” as cited in Claim 40. Thus, Claim 34, which depends from independent Claim 40, is allowable for at least the reasons discussed above.

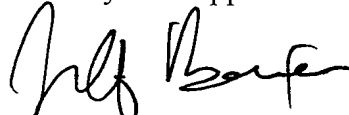
**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of pending Claims 2-7, 9-14, 33-40, and 42. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Applicants believe no fees are due. However, the Commissioner is authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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